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February 15, 2022

**Via ECF**

The Honorable Michael A. Hammer,  
United States Magistrate Judge  
Martin Luther King, Jr. Federal Building  
And Courthouse, 2<sup>nd</sup> Floor  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *Bianchi v. Samsung Electronics America, Inc. et al.***  
**Civil Action No.: 2:17-cv-01263-CCC-MAM**

Dear Judge Hammer:

This firm, along with Squire Patton Boggs (US) LLP, represents defendant Samsung Electronics America, Inc. ("SEA") in the above-referenced matter. Together with Plaintiffs' counsel, we are providing a joint status report in furtherance of the Court's Text Order of January 10, 2022.

As previously reported, a mediation with the Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.) resulted in a Settlement Agreement. The parties continue to work jointly and propose updating the Court with our further progress in April 2022.

Respectfully,

*/s/ James J O'Hara*

JAMES J. O'HARA  
On behalf of Defendant,  
Samsung Electronics America, Inc.

Respectfully,

*/s/ Kevin Laukaitis*

KEVIN LAUKAITIS  
On behalf of Plaintiffs

cc: Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.)